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6 Attorney for Omar Urena
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 OMAR URENA,

15 Defendant.

Case No. 2:24-cr-00135-JCM-EJY

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jacob Haile Operskalski, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Joy
20 Chen, Assistant Federal Public Defender, counsel for Omar Urena, that the Revocation Hearing
21 currently scheduled on November 4, 2024, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel requires additional time to speak with Mr. Urena to counsel
25 him on his legal options.

26 2. Defense counsel requires additional time to review discovery and conduct
independent investigation.

1 3. The parties require additional time for negotiations to determine whether this
2 matter will proceed to a contested hearing or resolve via a joint recommendation to the Court.

3 4. The defendant is not in custody and agrees with the need for the continuance.

4 5. The parties agree to the continuance.

5 This is the first request for a continuance of the revocation hearing.

6 DATED this 31st day of October, 2024.

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8 RENE L. VALLADARES
9 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

10 By /s/ Joy Chen

11 JOY CHEN
12 Assistant Federal Public Defender

 By /s/ Jacob Haile Operskalski

 JACOB HAILE OPERSKALSKI
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 OMAR URENA,

7 Defendant.
8

Case No. 2:24-cr-00135-JCM-EJY

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Monday, November 4, 2024 at 10:30 a.m., be vacated and continued to December 9, 2024 at
12 the hour of 10:30 a.m.; or to a time and date convenient to the court.

13 DATED November 1, 2024.

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16 UNITED STATES DISTRICT JUDGE